



Kayak and Canoe Club of New York
Conservation Committee

March 18, 2006

Mr. Mervin Brokke
U.S. Army Corps of Engineers
Wanamaker Building,
100 Penn Square East
Phila, PA 19107-3390

Re: COMMENTS of the Kayak and Canoe Club of New York on the 2006 Lehigh
Recreational Plan

Dear Mr. Brokke:

The Kayak and Canoe Club of New York (KCCNY) is a 501(c)3 non-profit organization, with nearly 300 members in New York, New Jersey, and Pennsylvania. We have maintained a long-standing interest in recreational opportunities on the Lehigh River, and commented on the 2005 Recreational Plan.

The importance of the Lehigh River to the whitewater boating community may be demonstrated by a single simple statistic. "Dam-controlled" rivers are those on which releases are controlled by dams, either for power or flood control purposes. The American Whitewater Affiliation maintains a database of dam-controlled river reaches throughout the nation where whitewater recreational releases occur. This database shows that in Pennsylvania, there are seven such reaches on four rivers, totaling 62 miles of boatable whitewater*. Of these rivers, the Youghiogheny is in the southwestern corner of Pennsylvania, 5 hours by car from Philadelphia, Tohickon Creek holds scheduled releases only twice a year, and the Lackawaxen River does not release on weekends.

Not only does the stretch of the Lehigh River below the Francis E. Walter Dam constitute fully 56 percent of the dam-controlled whitewater in the Commonwealth, it is the only such whitewater that releases at times and in a location convenient to the heavily populated areas of eastern Pennsylvania and nearby states.

* The rivers are the Youghiogheny River (2 reaches, 17 miles), Tohickon Creek (1 reach, 5 miles), the Lackawaxen River (1 reach, 5 miles) and the Lehigh River (3 reaches, 35 miles).

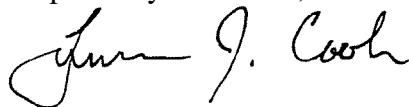
Consistent boatable whitewater releases contribute to the public good by providing high quality recreational activities to a large and growing segment of the public. Thousands of people take advantage of those opportunities, helping the economy of the region. We believe that the extent of the economic benefits to the community will become clear once a full season of 22 scheduled releases is successfully achieved.

KCCNY supports the U.S Army Corps of Engineers program of expanded whitewater recreational releases from the Francis E. Walter Dam on the Lehigh River. While environmental conditions during 2005 were not sufficient to allow for the scheduled number and volume of releases, we feel that the USACE's plan to raise the pool to 1365 feet offers better hope for a successful 2006 boating season, while balancing the variety of recreational opportunities that the Lehigh supports. We anticipate that the information and experience gained during the 2006 season will enable further refinement and improvement of releases in future years.

We are concerned, however, about the requirement that the pool be kept within a 5-foot range during May and June to encourage spawning and the development of an in-reservoir power-boat fishery. We feel that this may make it difficult or even impossible to maintain sufficient water reserve in the reservoir. It limits the flexibility of reservoir management during the rainy season. It may necessitate either cancellation of releases or downstream fishery conservation flows, or alternatively, dumping of water that would prove valuable later in the season for releases or cold water flow, solely to keep reservoir levels within this narrow range. The 5-foot elevation range limitation may ultimately need to be abandoned should it prove to conflict with providing releases for whitewater boating and conservation and cold water flows for the downstream trout fishery.

The Kayak and Canoe Club of New York appreciates the opportunity to comment on these proceedings, and look forward to working with the USACE and other parties to ensure the continued success of recreation on the Lehigh River. We would like to thank the U.S Army Corps of Engineers and other cooperating agencies for allowing this opportunity for public input, and we would also like to thank those members of the boating and fishing communities and the public who have worked so hard to make these releases possible.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lauren J. Cook". The signature is fluid and cursive, with the first name "Lauren" being more prominent than the last name "Cook".

Mr. Lauren J. Cook
Conservation Chair
Kayak and Canoe Club of New York